



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 28 2010

THE ADMINISTRATOR

Deborah L. Swackhamer, Ph.D.
Judith L. Meyer, Ph.D.
Science Advisory Board
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Dr. Swackhamer and Dr. Meyer:

Thank you very much for the thoughtful suggestions you provided in Science Advisory Board's April 27, 2010, report on the U.S. Environmental Protection Agency's draft guidance document "Empirical Approaches for Nutrient Criteria Derivation." The EPA believes that developing and adopting numeric water-quality criteria for nutrients is a key step toward restoring and protecting the quality of our nation's waters. This important draft guidance document is one of several that the EPA has developed to assist water-quality scientists in deriving numeric nutrient criteria.

We currently are modifying the guidance and including many of your ideas on revising and restructuring the document to make it more useful for state, tribal, regional and local water-quality scientists. I am pleased that your report supports developing guidance on the use of the stressor-response approach and points out that it is a legitimate, scientifically based method for developing nutrient criteria.

Specifically, we are revising the document to state more clearly the scope and intended use of the guidance. In it, we also will emphasize that the analytical methods covered are specifically applicable to data most often available to states and tribes engaged in deriving numeric nutrient criteria. These available data are usually collected during routine monitoring, with one or two samples per site, and include measurements of total nutrient concentrations and some of the other environmental factors that might be influential. In addition, other revisions include more detailed descriptions of the current scientific understanding of how changes in nutrient concentrations can influence designated uses as well as more complete coverage of the assumptions and limitations inherent in the use of different statistical techniques.

As you know, excessive nutrients in our nation's surface waters pose a complex environmental challenge. We anticipate that the revised guidance will help states and tribes effectively meet that challenge using stressor-response relationships where appropriate for deriving numeric nutrient criteria with a sound scientific basis.

Once more, please accept my appreciation for being so generous with your time and expertise.

Sincerely,

A handwritten signature in black ink, featuring a large, stylized initial 'L' followed by a series of loops and a long horizontal stroke extending to the right.

Lisa P. Jackson